

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEEPROOT CAPITAL MANAGEMENT, LLC,	§	JOINTLY ADMINISTERED
ET AL.	§	
	§	CHAPTER 7
DEBTOR	§	

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**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

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Please take notice that Anna K. MacFarlane, of the firm of Pulman, Cappuccio & Pullen, LLP, counsel for John Patrick Lowe, Chapter 7 Trustee (“Trustee”) hereby requests, pursuant to Fed. R. Bankr. P. 2002, 9010, BLR 2001, 11 U.S.C. § 1101, *et seq.*, and all other applicable bankruptcy statutes and rules, that any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) of reorganization, or other documents filed or entered in this case, be transmitted to:

**Anna K. MacFarlane**  
PULMAN, CAPPUCCIO, & PULLEN, LLP  
2161 NW Military Highway, Suite 400  
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Please take further notice that the foregoing request includes not only the notices and papers referred to in the rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, including disclosure statements or plans, whether formal or information, written or oral, and by whatever method

transmitted or conveyed or otherwise filed or made with regard to the above-captioned bankruptcy case and any and all proceedings therein.

This Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be a waiver of the rights of Trustee (i) to have final orders in non-core matters entered only after de novo review by a District Court Judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal or (iv) to any other rights, claims, actions, setoffs, or recoupments to which Trustee is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated this 9th day of September, 2022.

Respectfully submitted,

**PULMAN, CAPPUCCIO & PULLEN, LLP**  
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**ATTORNEYS FOR**  
**JOHN PATRICK LOWE, CHAPTER 7 TRUSTEE**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9<sup>th</sup> day of September 2022, a true and correct copy of the foregoing document has been furnished via Electronic Noticing to all parties receiving notice by CM/ECF, as set forth below.

**Via Counsel CM/ECF:**

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deeproot 575 Fund, LLC

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Texas Workforce Commission

c/o Christopher S. Murphy

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